

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:

KIMBERLY WRIGHT,
Debtor

MANCHESTER TOWNSHIP,
Movant

v.

KIMBERLY WRIGHT

AND

CHARLES J. DEHART, III
CHAPTER 13 TRUSTEE,
Respondents

Chapter 13

Case No. 1-18-bk-00373-HWV

MANCHESTER TOWNSHIP'S RESPONSE
TO DEBTOR'S REQUEST FOR STAY OF PROCEEDINGS

COMES NOW, this 15th day of May, 2018, Manchester Township, by and through its attorneys, CGA Law Firm, Lawrence V. Young, Esquire, and responds to Debtor's Request to Stay of Proceedings as follows:

1. Manchester Township merely seeks to lift the Automatic Stay for the purpose of perfecting a lien for unpaid municipal charges. Manchester Township has no intention of further executing against the real estate located at 1869 Brandywine Lane, Manchester Township, York County, Pennsylvania ("the Property").

2. It is denied that the Defendant occupies the Property as a primary residence. The Property is located at 1869 Brandywine Lane, Manchester Township, York County, Pennsylvania. The Debtor, however, in her own paperwork, lists her address at 2536 Eastern Blvd., #122, York, Pennsylvania 17402. It is averred that Debtor's residence is in a different municipality and even has a different zip code.

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3. Proof of Claim #2-1 filed in the within case by Manchester Township on April 24, 2018 includes supporting documentation evidencing the debt owed to Manchester Township by the Debtor. A copy of that Proof of Claim and the supporting documentation is attached hereto incorporated herein by reference as Exhibit "A."

4. A continuance has been granted and was not opposed, but ultimately Manchester Township's Motion for Relief from the Automatic Stay for the purpose of placing a lien upon the Property for unpaid municipal charges should be granted.

5. The actions of Manchester Township are not unfair or deceptive.

WHEREFORE, it is requested that the relief sought by Manchester Township be granted.

Respectfully submitted,

CGA Law Firm

/s/Lawrence V. Young, Esquire
Lawrence V. Young, Esquire
Supreme Court No. 21009
135 North George Street
York, PA 17401
Telephone: 717-848-4900
Attorney for Movant

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CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on May 15, 2018, a true and correct copy of the attached document was served upon the following parties in the following manner:

Name	Mode of Service
Kimberly Wright 2536 Eastern Blvd. #122 York, PA 17402	United States First Class Mail, Postage Prepaid
Charles J. DeHart, III, Chapter 13 Trustee	Via CM/ECF

I certify under penalty of perjury that the forgoing is true and correct.

Dated: 05/15/2018

/s/Lawrence V. Young, Esquire
Lawrence V. Young, Esquire

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